

EXHIBIT 3

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Attorneys for Defendants Kuntzman Family LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC

Plaintiff,

v.

KUNTZMAN FAMILY LLC,

Defendant(s)

Adv. Pro. No. 10-04752 (SMB)

AMENDED INITIAL DISCLOSURES

Kuntzman Family LLC (the “Defendant”), by and through its attorneys, and pursuant to Rule 26 of the Federal Rules of Civil Procedure and Rule 7026 of the Federal Rules of Bankruptcy Procedure, and the Local Rules of this Court, make the following disclosures:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

1. Bernard L. Madoff
Federal Penitentiary
Butner, North Carolina
2. Irving H. Picard
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
3. Dean Hunt
Baker & Hostetler LLP
811 Main Street, Suite 1100
Houston, Texas 770022
4. Maximillian Shifrin
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45 Rockefeller Plaza
New York, New York 10111
5. Depository Trust Company
6. Annette Bongiorno
7. Daniel Bonventre
Federal Correctional Institution
Schuylkill, Minersville, Pennsylvania
Inmate Register Number 63156-054
8. Enrica Cotellessa-Pitz
107 Garden Gate Trail
Marietta, South Carolina 29661
9. JoAnn Crupi
10. JoAnn Sala
11. Winifier P. Jackson
1220 Croes Avenue, Apt. 5D
Bronx, New York 10472
12. Alethea Leung
29 Rickard Court
Lawrence Township, New Jersey 08648

13. Dorothy Khan
107-37 124th Street
South Richmond Hill, New York 11419
14. Robert Gutman
301 E. 79th Street, Apt. 11A
New York, New York 10075
15. Walter Tiletnik
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New York, New York
16. Peter George Tiletnik
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17. Hendrik Voigt
24 Wickham Way
Chatham, New Jersey 07928
18. Steven Friedman
50 Grange Avenue
Fair Haven, New Jersey 07704
19. Peter Berkowitz
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Sudbury, Massachusetts 01776
20. Heath Sroka
30 Whig Road
Scarsdale, New York 10583
21. Zafer Barutcuoglu
165 Christopher Street, Apt. 6Z
New York, New York 10014
22. Ned Zachar
372 Guard Hill Road
Bedford, New York 10506
23. Jonathan Lenaghan
1110 Park Avenue, Apt. 4R
Hoboken, New Jersey 07030
24. Neilay Mehta
230 E 25th Street, Apt. 5E
New York, New York 10010

25. Richard C. Yeh
299 6th Avenue, Apt. 1
Brooklyn, New York 11215
26. Paolo Vicinelli
15 Dante Street
Larchmont, NY 10538
27. Jamie Lynn Rosenberger
9 Harriman Avenue
Yonkers, New York 10701
28. Linda Coribello
JPMorgan Chase Bank, N.A.
4 Chase Metrotech Center, Floor 18
Brooklyn, New York 11245
29. Benjamin D. Klein
Wachtell, Lipton, Rosen & Katz
51 West 52nd Street
New York, New York, 10019
30. Bruce Dubinsky
31. Lisa Collura
32. Matthew Greenblatt
33. Steve Maslow
2773 South Ocean Boulevard, Apt. 401
Palm Beach, Florida 33480

(B) A copy of, or a description by category and location of all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

1. All third party records in the Trustee's possession or control evidencing or relating to the purchase, custody or sale of securities.
2. Documents evidencing communications between SIPC and the House Financial Services Committee.
3. Documents evidencing communications between SIPC and the SEC.

4. The marketing materials and documents evidencing communications relating to the Trustee's efforts to sell the market making and proprietary trading businesses.
5. Communications between the Trustee and JPMorgan Chase and/or their respective attorneys concerning the Coribello Declarations and/or concerning the ownership of the 509 and 703 accounts.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

1. To the extent appropriate, Defendants intend to seek an award of counsel fees against the Trustee and his counsel.

Defendants reserve the right to supplement and/or amend these initial disclosures as more information becomes available during the course of this action and as the issues are clarified through court proceedings. Defendants also reserve the right to rely upon:

1. Any documents in the possession or under the control of the Trustee.
2. Any documents produced by third parties in connection with third party discovery.
3. Any documents produced in other adversary proceedings in this SIPA liquidation proceeding or any related proceeding.

Dated: New York, New York
July 2, 2019

CHAITMAN LLP

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LLC*

CERTIFICATE OF SERVICE

I hereby certify that, on July 3, 2019, a true and correct copy of the foregoing was served
by electronic mail upon:

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Dated: New York, New York
July 3, 2019

/s/ Helen Davis Chaitman